IN-SUSPECT SITE INVESTIGATION Case #00525

West Lake Quarry and Landfill St. Louis County

JAN 3 1984

Westlake LdH

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INVESTIGATOR:

Mike Duvall

Chief - Waste Management Unit St. Louis Regional Office

Missouri Department of Natural Resources

DATE INVESTIGATION INITIATED: May 24, 1983

DATE INVESTIGATION COMPLETED:

December 5, 1983

III. BACKGROUND OF INVESTIGATION:

Site:

Sept.

1775

The agency inquiry into this site was based upon testimony obtained from an interview of David Covert, a former driver for the Bliss Waste Oil Company. The pertinent exerpts from the interview, as conducted jointly by Mike Cole of the U.S. Environmental Protection Agency (U.S. EPA) and Don Boos of the Missouri Department of Natural Resources (MDNR), are recorded in a summary memo dated April 26, 1983. In this same memo prepared by Mr. Boos, staff of the Department of Natural Resources-St. Louis Regional Office (DNR-SLRO) were assigned the case for full investigation in accord with the suspect dioxin site protocol.

IV. IDENTIFY OF PERSONS REFERENCED IN THIS REPORT:

Contact Information

Association

Mr. Don W. Boos Environmental Specialist III Waste Management Program Missouri Department of Natural Resources (314) 751-3241

Former special dioxin investigator

Mr. Mike Cole Air & Waste Management Division U.S. EPA - Region 7 324 E. 11th Street Kansas Citv, Misscuri 64106 (816) 374-6864

Former investigator and coordinator of dioxin effort in Eastern Missouri

Mr. David Covert Route 4, Box 93 Pacific, Missouri 63069 (314) 257-6462

Ex-driver for Bliss Waste Oil Company

Mr. Vernon Fehr West Lake, Inc. 13570 St. Charles Rock Road Bridgeton, Missouri 63042 (314) 739-1122

Site Manager

Mr. Gary Lambarth (current address unknown) Ex-driver for Bliss Waste Oil Company



40055879 SUPERFUND RECORDS



Company President

Mr. William McCullough West Lake, Inc. 13570 St. Charles Rock Road Bridgeton, Missouri 63042 (314) 739-1122

Mr. Viraf Palsetia Environmental Engineer St. Louis Regional Office Missouri Department of Natural Resources Assistant Investigator

Mr. Ray Snyder
Sanitarian
St. Louis County Department of Community
Health and Medical Care
7701 Brentwood Boulevard
Clayton, Missouri 63105
(314) 726-1100

Inspector, Waste Management Section

V. BRIEF SUMMARY OF INFORMATION OBTAINED:

A field inspection and on-site meeting were conducted to gather the information for this investigation.

Supporting testimony was not obtained to corroborate the Covert account regarding past involvement of the Bliss Waste Oil Company at this site. An examination of the statements made by Mr. Covert, along with a review of the Department file on the facility, however, point to the probability that the property was oiled by Bliss during the early-to-mid 1970s period. No unusual health-related problems indicative of dioxin contamination have been reported for this site.

A statement was obtained for the record on behalf of the West Lake Company. Voluntary consent was likewise secured to allow soil care sampling of representative segments of the site by state/federal agencies, should such action be deemed appropriate.

VI. DETAILED RECOUNT OF INVESTIGATION:

A review of the original guidance memo from Don Boos revealed some uncertainty on the part of David Covert in his earlier statement regarding the specific site entity in question. These original testimony exerpts reference a large area along St. Charles Rock Road, north of I-270 in St. Louis County, where heavy machinery/construction equipment could be found. Mr. Covert also described the site as a 'Fred Weber - like place', which reinforced the notion of an operation involved with heavy equipment such as a major road building contractor. Another testimony excerpt taken from a transcript of an interview of another ex-driver for Bliss, Gary Lambarth, alludes to the same site. In a transcript dated April 20, 1983 as recorded by Mr. Boos, Mr. Lambarth recalls 'dumping a lot of stuff' at Fred Weber Quarry, by Earth City near St. Charles Rock Road during the early 1970s. He described an additional reference point for the operation as 'a factory right across the street from it'.

Definitive identification of the site intended by the ex-drivers in their original statements was, therefore, the first item of business for the investigator. Based upon these initial clues and previous knowledge of the area, the deduction was made that the facility being referenced was actually

the West Lake company operation, located along the south side of St. Charles Rock Road in Bridgeton. The investigator was already very familiar with the operation from the regulatory perspective of inspection of the landfill at this location. The Department has maintained files on the West Lake site at both the central and regional office levels. File information to date encompasses permit documents, site geology and engineering reports, landfill design plans and operating procedures, and compliance inspection history.

West Lake, Inc. has owned and operated a limestone quarry plant and landfill at the St. Charles Rock Road site since the 1930s. The total property comprises some 260 acres situated generally on the terrace and historical flood plain of the Missouri River. The original landfill sectors were operated in the flood plain prior to construction of the Earth City flood control levee in the 1960s. Landfill development has since progressed generally in a south-easterly direction to accommodate land reclamation of the abandoned quarry pits. The current West Lake facility consists of a complete quarry operation including excavators, rock crusher, materials stockpiles, concrete mixing and asphalt blending plants, and all ancillary equipment. A fleet of transport vehicles including dump trucks, tankers and cement mixers is also maintained at the site.

As previously referenced, West Lake is permitted by the Department to conduct sanitary and demolition landfilling operations on the property. Environmental control considerations have prompted development of appurtenant facilities including extensive systems for collecting and treating leachate and decomposition gas. Some older landfill sectors have also come under agency review in accord with abandoned/uncontrolled hazardous waste site protocol, since loads of toxic industrial sludges and low level radioactive debris are known to have been dumped in earlier years. Site stabilization/remedial plans for these problem sectors are being considered by both the federal NRC and the DNR. Most recently, the Department has directed the company to conduct an in-depth geohydrologic study of the entire property, with development and implementation of an updated groundwater monitoring system to follow.

Cognizant of the history of the West Lake site as described, the investigator elected to question the principal informant, David Covert, on his recollection of any further details regarding the waste oiling incident(s) in question. A meeting was held with Mr. Covert at his Pacific residence on May 24, 1983 in an attempt to further clarify his testimony on this and other cases assigned for investigation at that time. Mr. Covert readily confirmed that the West Lake property was indeed the site he had intended to identify in his original statement. Upon further discussion he described the sections oiled as being the main site entrance road off St. Charles Rock Road and the area immediately surrounding a building which he referred to as the 'diesel shop'. Mr. Covert remembered spreading oil on these sections for dust control on a couple of occasions, and estimated the time frame as somewhere around 1972-73. Mr. Covert had no recollection of payment for services being rendered, and speculated that the oil spraying jobs may have been traded for the right to remove drain oil from West Lake's storage tanks, which were located underground in the immediate vicinity of the diesel shop.

Having established the location recalled by Mr. Covert, the investigator arranged a meeting with company officials at the West Lake facility on June 9, 1983, accompanied also by Mr. Ray Snyder of the St. Louis County Department of Community Health and Medical Care. Representing the company at this time were Mr. Wm. McCullough, President, and Mr. Vernon Fehr, manager of site operations. These gentlemen were questioned on their recollection of past oiling incidents anywhere on the West Lake property, and in specific

regard to the sectors identified by David Covert. Both men denied any knowledge of such oiling work having been performed on any part of the premises at any point in time. The management responsibilities of both Messrs McCullough and Fehr, as well as their time frames of association with the West Lake operation, place them in key positions of awareness on this issue. Mr. McCullough claimed to base his opinion on the matter also on interviews with subordinates who were familiar with plant operations during the early 1970s. A signed statement was also prepared by Mr. McCullough in the presence of the investigator which summarized his testimony on the matter. This statement also grants voluntary consent on behalf of the company to soil core sampling by the state and federal agencies, and is included as a report attachment.

Following the on-site meeting at West Lake, the investigator conducted routine surveillance of the landfill operation and proceeded to make special observations of the plant area identified in the Covert interviews. The attached photo prints were compiled from this surveillance visit. It was noted that the site entrance road off St. Charles Rock Road splits around the office building whereupon it merges into a parking lot for employees and visitors. The combined road/lot stretches approximately 012 miles, broadens to 130' at the widest point, and is paved in its entirety by asphalt. Beyond this point the roadbed returns to rock composition and forks to route truck traffic to the various quarry plant and landfill sectors. The east fork can be followed another 0.2 miles to the site of the crusher plant/equipment maintenance building. The maintenance building houses a lube oil service bay which accommodates the West Lake truck fleet. Drain oil is routed from the bay to a below-ground collection tank with a holding capacity of 1,000 gallons, located on the immediate north side of the building. Mr. Fehr explained that the tank contents have always been pumped out on a regular basis under contract to various waste oil haulers. Bliss Waste Oil Company was, in fact, one of the haulers used for this purpose during the early through mid 1970s period. Control of fugitive dust on the roadbed traversing this plant sector is a constant maintenance task which is routinely handled by water application.

The investigator was forced to divert efforts to other assignments following field surveillance of the West Lake operation. The inquiry into this case was resumed again on August 23, 1983 during the course of a follow-up interview with David Covert, conducted again at his Pacific residence. Accompanied by Mr. Viraf Palsetia of his staff, the investigator had scheduled this meeting for the purpose of clarifying Mr. Covert's statements on other suspect dioxincontaminated site cases pending at that time. The investigators briefed Mr. Covert on the aforementioned surveillance of the West Lake property and reviewed the photo layout and site maps from the facility file, in an effort to more accurately pinpoint recollected areas of oiling. Mr. Covert said that the site entrance off St. Charles Rock Road as depicted in the photo prints did not look familiar, nor did he remember this section of road as being blacktopped. He did, however, express familiarity with the maintenance building area as depicted in the photos, and reiterated his original statement that he had spread waste oil on the rock roadbed in this sector. discussion with Mr. Covert regarding the West Lake property was concluded with the investigators having little doubt about the certainty of his recollections pertaining to this site.

VII. CONCLUSION AND RECOMMENDATIONS:

It is concluded that the West Lake, Inc. site in Bridgeton was oiled by the Bliss Waste Oil Company during the approximate period 1972-73. The suspect areas sprayed with oil for dust control consist primarily of the rocked roadbed in the immediate vicinity of the vehicle maintenance building, and may include

the remainder of the site access road leading back to the junction with St. Charles Rock Road and encompassing the parking lot surrounding the office. This conclusion is supported by consideration of the following factors:

- 1. Confidence in the statements of David Covert based upon credibility of his testimony obtained in other suspect site cases, wherein independent corroborating statements were obtained in the course of investigation.
- 2. Peripheral statements by Gary Lambarth, another former driver for Bliss, which allude to the site.
- 3. Substantiation of past involvement by the Bliss Waste Oil Company at the site by the admission of West Lake mangement, albeit on the basis of providing legitimate drain oil removal services only.
- 4. Review of the total file record on West Lake as maintained by the Department which documents a history of other inter-related environmental problems.

The incident occurrence has been placed within the time frame for high probability of dioxin contamination of waste oil used by Bliss Company in road oiling jobs. The lack of independent testimony directly supporting the Covert statement in this case is acknowledged, however. Other factors are also acknowledged which would have bearing on any hazard assessment of the site, particularly the encapsulation of a portion of the suspect roadbed afforded by the asphalt paving, and the sheer volume of additional rock materials added to the remaining, unpaved portion of the road over the ensuing years since the oiling occurrence. These factors would tend to suppress the potential for airborne dispersal of any dioxin-contaminated soil particles.

It is, therefore, recommended that the West Lake, Inc. site be assigned at least a moderate priority by the agencies for the scheduling of environmental sampling to ascertain the presence of TCDD contamination. It is further recommended that a priority pollutant scan be included in the sampling plan developed by DNR/EPA for this site. Representative sampling points should encompass the delineated stretches of the access roads at variable depths. Consideration should also be given to additional sampling points on other portions of the West Lake property, if for no other reason than to provide adequate background reference. Composite samples of leachate obtained from the landfill collection system could be included in a comprehensive sampling program for the site.

VIII. LIST OF APPENDICES:

- Signed statement of Wm. McCullough
- 2. USGS topo map excerpt with site reference
- 3. County highway map excerpt with site reference
- 4. File copy of site drawing depicting key features
- 5. Preliminary report (EPA outline format)
- 6. Transcript exerpts from G. Lambarth interview of April 20, 1983
- 7. Site photo prints with captions

IX. SIGNATURES:

Mike Duvall

Mike Duvall

Date 12 - 20 - 83

Chief-Waste Management Unit St. Louis Regional Office Department of Natural Resources

APPROVED BY:

F. Donald Maddox, P. E.

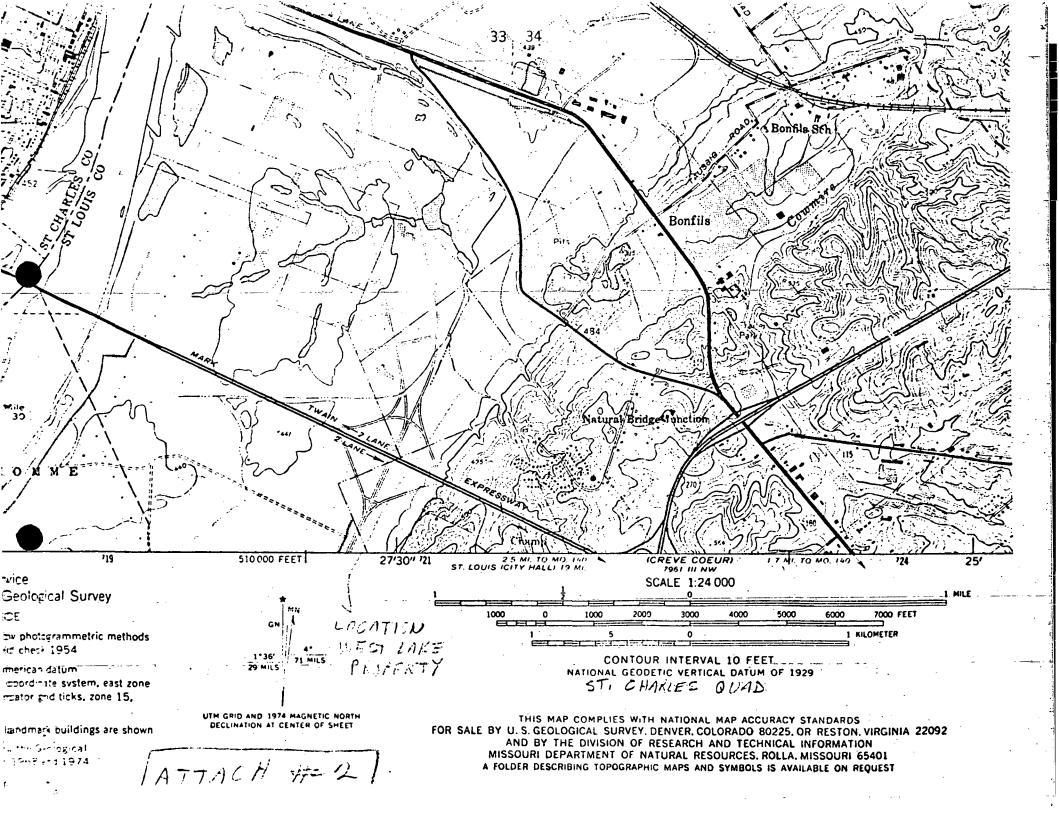
Regional Administrator
St. Louis Regional Office
Department of Natural Resources

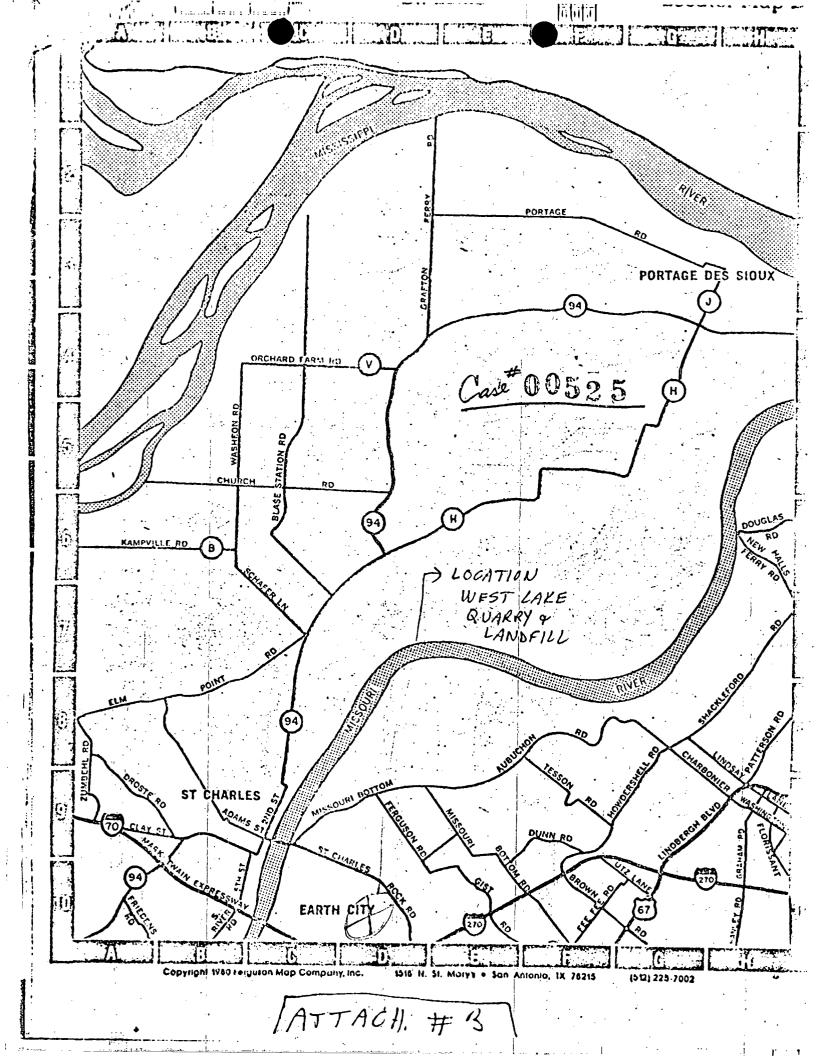
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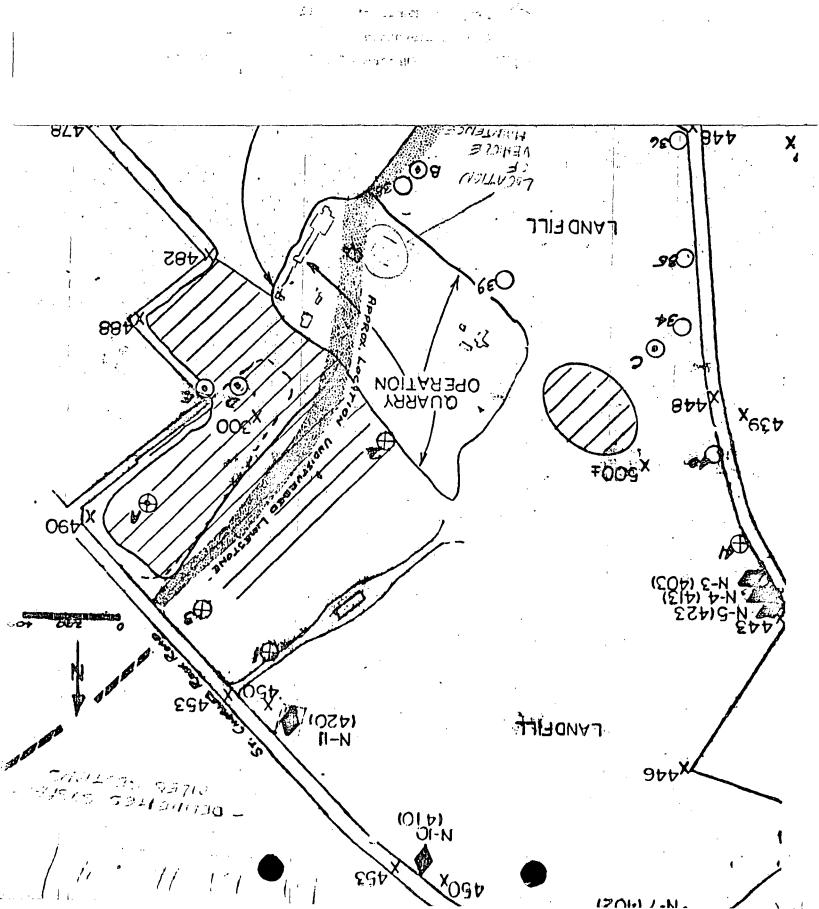
STATEMENT OF , voluntarily who has identified make the following statement to himself to me as an employee of the Missouri Department of Natural Singeton Missouri Resources. The statement is made at , 1983. on June 9 I have been employed at West Sile Guang since June 23, 1952 shoring that this of served as account pluce Maringer from 1961 to 1971 and S'eay Tuns. V. Cue from 1971 21981 Ruesdent to the date - During the lotter time we have always collated waste oil used in my to 50 Realy mix Trucker and 50 various other Eging mest in claims my to 1971 When a oil beildig was built with unlayout storage - We have alway sold our used ris on check basis to omione work oil companies during this entire genod we never used either our own oil or anyone class on our wade due to emetant during I mentenal which would made it useless. Our present dive for St Charles Rod Al & Luffill Office wer deposited when the began asphilt bosinese in 1964-65. of the has asphalted ever since. my Lenard Stein who monagel mage from 1972 until 1981 has indicated rel was solf for no odme lash a vavous conjunie encluly Blise al & right or used by he from the or anyone else I have read and reviewed the above statement, consisting of / and certified to the best of my knowledge and belief it is true and correct. No threats or promises of any kind have been made to me, nor have I been coerced in any manner.

Signed in the presence of Mike Diwill This Q An day of June

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ATTACH. # 5 |

POTENTIAL DIOXIN SITE RESPONSE

Preliminary Investigation Report

ı.	Date(s) of investigation	6-9-83		
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3.	Proper	ty Common Name $\underline{\mathcal{W}}$	est Lake Inc	. quarry & sanit	Landfill
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		Address as	above		
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Any Potential for Secondary Contamination (runoff, movement of soil, etc.): Yes No						
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5 L 17 O, INTERVIEW WITH GARY LAMBARTH ON APRIL 20, 1983
(DON BOOS, MDNR; MIKE COLE, EPA)

[Before the tape recorder was turned on, Boos had begun asking Lambarth about an anenymous, handwritten chart that MDNR had received a few years ago related to a waste hauler, obviously Bliss (see Attachment C)-Lambarth said perhaps it came from Judy Piatt)

Boos: The reason I think it isn't Judy Piatt, or wouldn't think it's Judy Piatt, is strictly because this individual knew some things that Judy Piatt didn't even knew. Judy Piatt was following Russell's trucks around. She wasn't following these trucks of drums. Judy never had anything to do with drums. This individual even talks about the drum issue. Let me just show it to you. What I'm trying to do is jog people's memory. Now the pencil mark on here is mine and that's written on here, but other than that, whose handwriting would you say that looks like? I did talk to Mary [Lambarth--Gary's ex-wife] and at some point I'd like for her to look at it just simply because she knew those drivers and she might recognize the handwriting, be it your or whoever's.

Cole: 1s that hers or yours or Jesse Orr's or Dave Coverts or any of those people?

mbarth: Well it looks a little bit like David Covert's. To me, the writing to me
looks like a woman's writing.

B: I'm no handwriting analyst.

- C: But you don't recall putting together something like that? Or seeing any of the other guys put it together?
- L: No. The only thing that I did, DNR's got the tape of that and, what's the attorney's name? Downey? Is that his name?
- C: Yes, Downey, Ed Downey.

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- L: Yeah.
- B: This deal here with a Jim Bussen of Bussen Quarries, does that ring any bells? Bussen Quarries?
- L: [Indicates no.]
- B: No? OK. What about Fred Weber. Was there as association between Fred Weber and Bliss to any degree?
- L: At one time I think that they were dumping a lot of stuff out there at the Fred Weber Quarry out there by Earth City.
- C: Is that near St. Charles Rock Road?
- L: Yeah. And they were covering it up. I spread stuff over in the East

 St. Louis Landfill over in Granite City and they'd just go behind you and

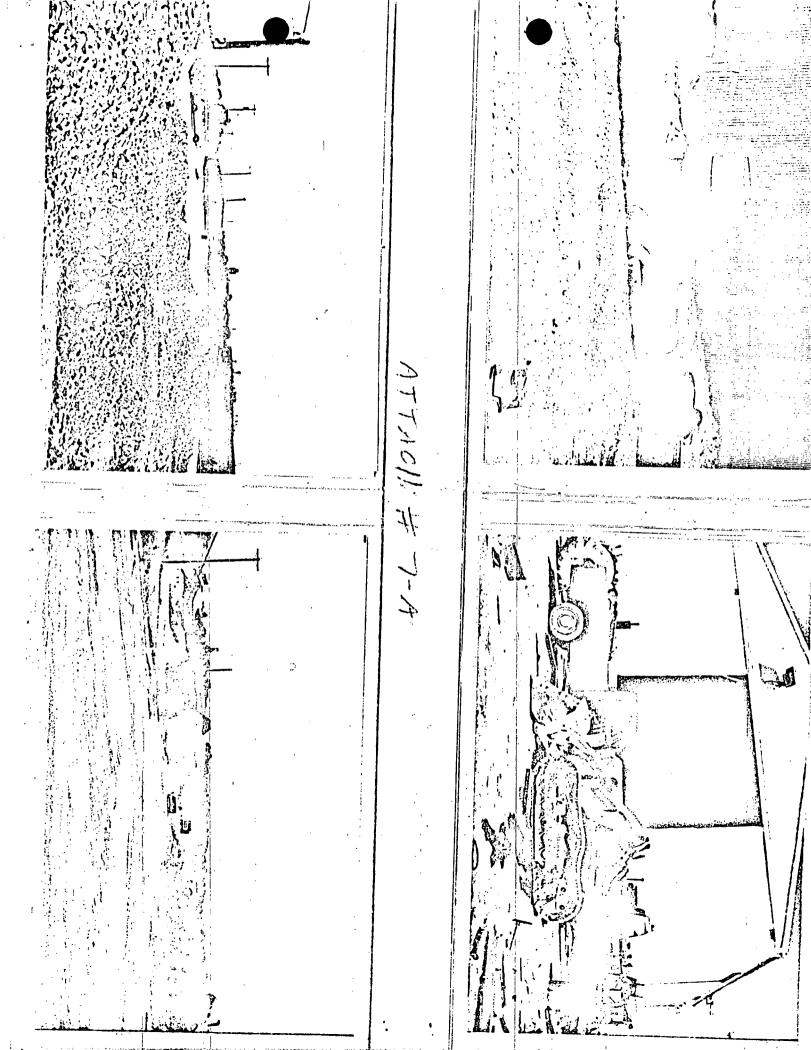
 cover it up with a dozer and just push it under.
- B: When you say stuff do you mean in general spraying materials or are you talking about barrels?
- L: No. Just sprayed material; I never hauled the barrels. I hauled a few
 barrels. I remember one incident when we were hauling out of General
 Cable and they loaded the trailer down and it was real acidy stuff and the
 barrels were eaten away on the trailer while we were going and the trailer
 was overloaded and we blew like four tires while going out of St. Louis
 and I think we threw like four barrels off right down off of Hanley Road
 and just kept going to get home, because the weight was so tremendous.
- B: So that quarry was out near Earth City. Do you remember what it was it was called. Fred Weber's Quarry? Did it have a name? Simpson's or Weber's?
- L: There was a factory right straight across the street from it. That's all I know. We dumped a lot of stuff.

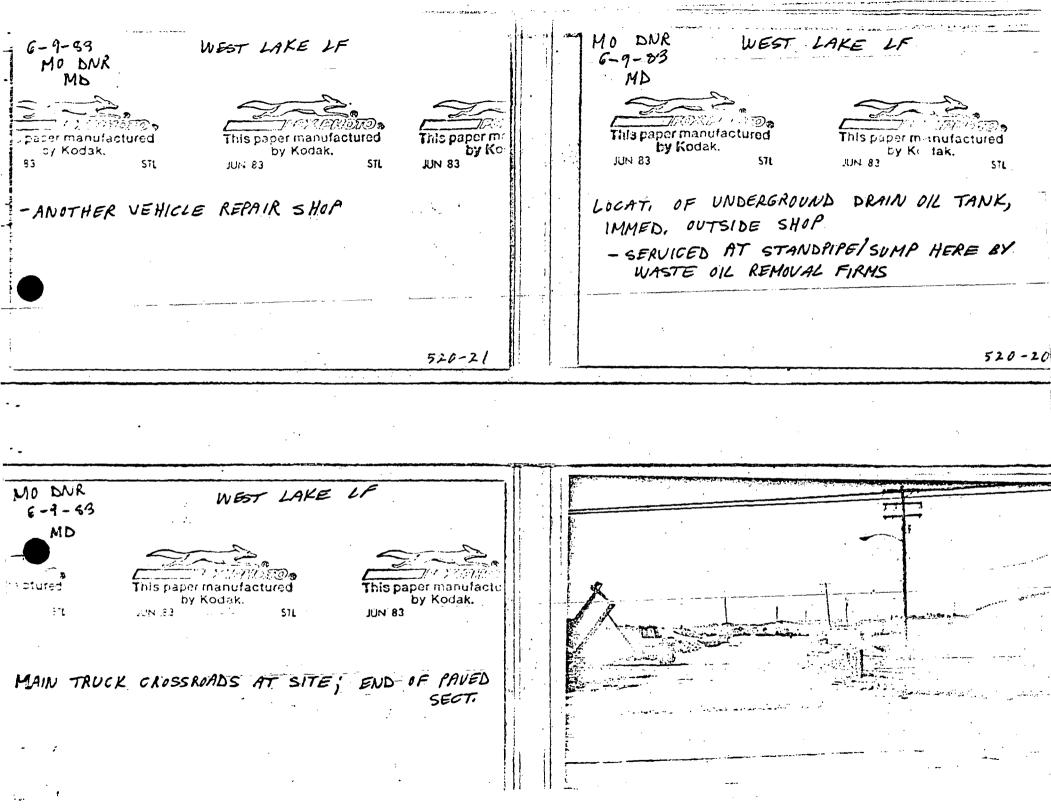
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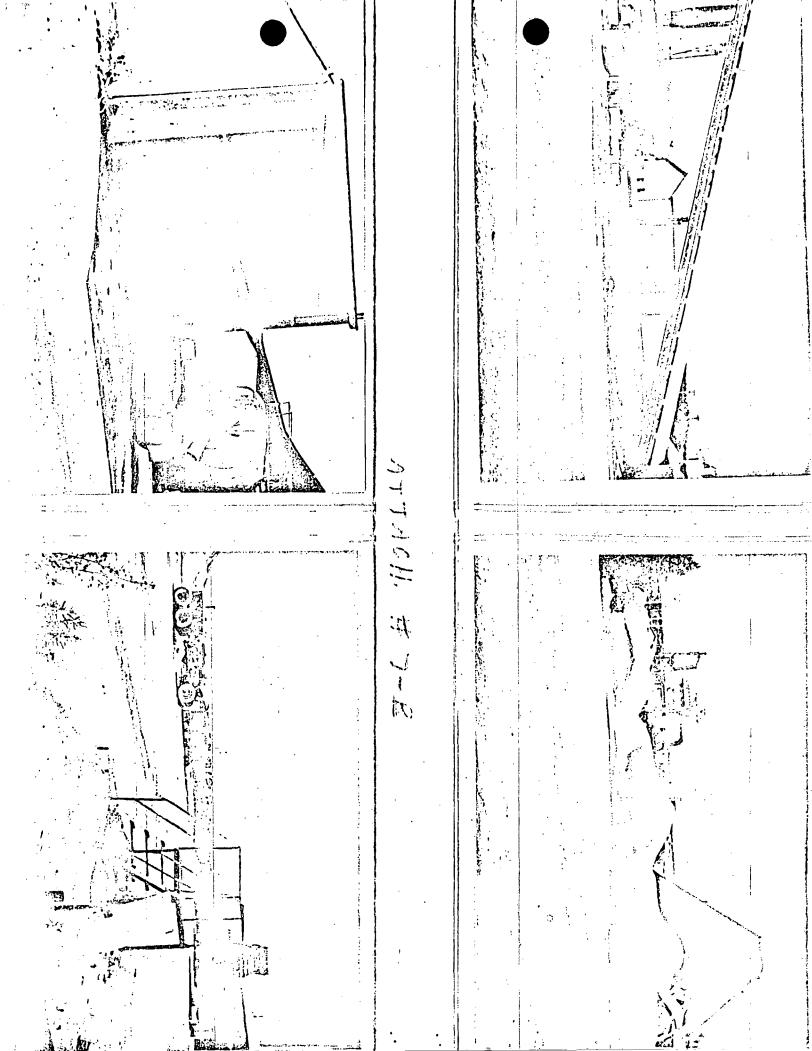
- R: Could you make an estimate of what years or what span of time you dumped out at Fred Weber's quarry?
- L: That was hack in '71 to '74, probably.
- C: Was it both before and after you went to Ann Arbor, in other words?
- L: Yeah, I think so. You're asking me something and I'm trying to pick
 all this out.
- C: Yeah, I know. I've said a lot of times I couldn't remember what I was doing back in the early 70's or late 60's.
- L: Well, I've been asked all this stuff lately, you know, a lot so it comes up. I've spent a couple of hours in my lawyer's office with the Attorney General.
- B: Simpson Materials, does that ring a bell?
- L: [Indicates no.]
- B: No bell at all. What about DAS Septic Tanks?
- C: Before you leave Simpson's could that be the same thing as Simpson

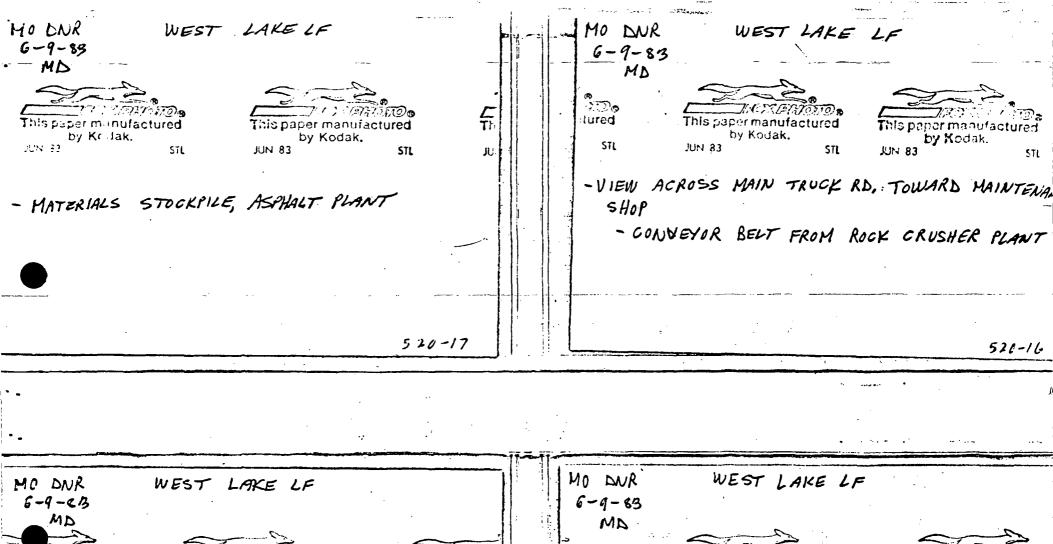
 Landfill or Valley Disposal off 141 I think Redbird's down there

 now. They call it Redbird BFI owns it.
- L: That's very possible. I've heard them talking that they went off
 of 141 someplace, but I've never been there.
- C: Have you been to West County [Landfill]?
- L: I oiled the road there. That's what I did there.
- C: Would that have been the same general time period the early 70's?
- L: Yeah.
- B: What kind of oil I mean, was it good oil, bad oil or what you'd call contaminated oil?



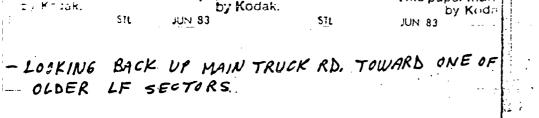






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